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Co-Counsel for Lead Plaintiffs and Proposed Co-Lead Counsel for the Class

[Additional counsel on signature page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CHRISTOPHER VATAJ, Individually and
on Behalf of All Others Similarly Situated,

Plaintiff,

v.

WILLIAM D. JOHNSON, JOHN R. SIMON,
GEISHA WILLIAMS, and JASON P.
WELLS,

Defendants.

Case No. 4:19-cv-06996-HSG

**STIPULATION AND [PROPOSED]
ORDER REGARDING THE FILING
OF AN AMENDED COMPLAINT
AND RESPONSE THERETO**

CLASS ACTION

WHEREAS, on October 25, 2019, Plaintiff Christopher Vataj (“Vataj”), individually and on behalf of all others similarly situated, filed a putative class action complaint on behalf of investors in PG&E Corporation against defendants William D. Johnson, John R. Simon, Geisha

Williams, and Jason P. Wells (collectively, “Defendants”) alleging violations of Sections 10(b) and 20(a) of the Securities Exchange Act of 1934 (“Exchange Act”), 15 U.S.C. §§ 78j(b) and 78t(a), and Securities and Exchange Commission (“SEC”) Rule 10b-5 promulgated thereunder, 17 C.F.R. § 240.10b-5 (the “Complaint”) (Dkt. No. 1);

WHEREAS, on the December 24, 2019 statutory deadline to seek appointment as Lead Plaintiff and approval of Lead Counsel in the above-captioned securities class action brought pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”), three movants or movant groups filed such motions: (1) Iron Workers Local 580 Joint Funds and Ironworkers Locals 40, 361 & 417 Union Security Funds (the “Iron Workers Funds”) (Dkt. No. 19); (2) Robert Allustiarti (“Allustiarti”) (Dkt. No. 23); and (3) Bob Vavla (“Vavla”) (Dkt. No. 25);

WHEREAS, on January 6, 2020, Vavla filed a notice of withdrawal of his motion (Dkt. No. 32), leaving only the motions of the Iron Workers Funds and Allustiarti before the Court;

WHEREAS, on January 7, 2020 the Iron Workers Funds and Allustiarti filed the Stipulation and [Proposed] Order Appointing Co-Lead Plaintiffs and Approving Selection of Counsel (Dkt. No. 33);

WHEREAS, on February 3, 2020, the Court entered an order appointing Iron Workers Fund and Allustiarti as Co-Lead Plaintiffs and their counsel as Co-Lead Counsel pursuant to Section 21D of the Securities Exchange Act, 15 U.S.C. § 78u-4; and

IT IS HEREBY STIPULATED, that subject to the Court’s approval:

1. Defendants shall not be required to answer or otherwise respond to the Complaint.
2. Co-Lead Plaintiffs shall file an amended complaint, or notify Defendants in writing that Lead Plaintiff intends to rely on the current complaint, on or before April 3, 2020.
3. Defendants shall answer or otherwise respond to the operative complaint on or

1 before June 2, 2020.

2 4. If Defendants move to dismiss the operative complaint, Co-Lead Plaintiffs shall
3 file their response brief on or before August 3, 2020. Defendants shall file their reply brief on or
4 before September 2, 2020.

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6 Dated: February 4, 2020

Respectfully submitted,

7 **POMERANTZ LLP**

8 /s/ Louis C. Ludwig

9 Louis C. Ludwig
10 (admitted pro hac vice)
Jared Schneider
(admitted pro hac vice)

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1 Dated: February 11, 2020

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2 /s/ Jonathan Horne

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27 *Additional Counsel for Plaintiff Allustiarti*

28 Dated: February 11, 2020

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/s/ Gregory R. Jones

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7 * * *

8 **ORDER**

9 PURSUANT TO STIPULATION, IT IS SO ORDERED.

10 DATED: _____
11

12 _____
13 HONORABLE HAYWOOD S. GILLIAM, JR.
14 UNITED STATES DISTRICT COURT JUDGE
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LOCAL RULE 5-1 ATTESTATION

I, Louis C. Ludwig, am the ECF User whose ID and password are being used to file this
STIPULATION AND [PROPOSED] ORDER REGARDING THE FILING OF AN AMENDED
COMPLAINT AND RESPONSE THERETO. In compliance with Local Rule 5-1(i)(3), I hereby
attest that the other signatory to this document, Jonathan Horne and Gregory R. Jones, concurred
in the filing of this document.

Dated: February 11, 2020

Louis C. Ludwig
Louis C. Ludwig

CERTIFICATE OF SERVICE

I, Louis C. Ludwig, hereby declare under penalty of perjury as follows:

I am a partner attorney at Pomerantz LLP, with offices at 600 Third Avenue, 20th Floor, New York, NY 10016. I am over the age of eighteen.

On February 11, 2020, I electronically filed the following STIPULATION AND [PROPOSED] ORDER REGARDING THE FILING OF AN AMENDED COMPLAINT AND RESPONSE THERETO with the Clerk of the Court using the CM/ECF system which sent notification of such filing to counsel of record.

Executed on February 11, 2020.

/s/ Louis C. Ludwig
Louis C. Ludwig